

State Ethics Commission

ANNUAL REPORT 1993



STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



COMMISSION MEMBERS:
MARK C. MEDAIRY, JR., *Chairman*
MICHAEL L. MAY
ROBERT J. ROMADKA

STATE ETHICS COMMISSION
300 E. JOPPA ROAD, SUITE 301
TOWSON, MARYLAND 21286
(410) 321-3636

JOHN E. O'DONNELL
Executive Director
NANCY L. SPECK
General Counsel
ROBERT A. HAHN
Staff Counsel

STATE ETHICS COMMISSION

FIFTEENTH ANNUAL REPORT

January 1, 1993 - December 31, 1993

NOTE: Robert J. Romadka was appointed to the Commission in December of 1993 and attended his first meeting in January of 1994. Shirley P. Hill and Mary M. Thompson were members of the Commission during all of 1993 and both resigned in early 1994. Dr. Robert C. Rice was a member of the Commission until June of 1993.

STATE ETHICS COMMISSION

Fifteenth Annual Report

January 1, 1993 - December 31, 1993

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 9 times during Calendar Year 1993. The number of meetings has been limited due to fiscal limitations. The Commission and its staff were also forced to continue to limit program operations in all areas due to reduced operational fiscal support. Programs for automating lobbying and financial disclosure activities were also stalled as a result of fiscal cutbacks and the limitations in staff resources.

During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure and restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities. Substantial activity also involved implementing the provisions of the law which reestablished ethics, campaign finance, and related restrictions on land use decisions in Prince George's County. The Commission also considered and approved faculty conflict of interest procedures for one campus in the University of Maryland System. Commission regulations were reviewed during 1993 with adjustments being made where appropriate. In view of a lack of filing space and equipment, the Commission further revised its records retention program.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1993, the Commission issued 17 formal published opinions. Most of the formal opinions issued primarily dealt with the employment or ownership interest prohibitions under §3-103(a) of the Ethics Law. Other issues considered included gifts, jurisdiction over officials, misuse of position, and the application of the Prince George's County land use ethics law requirements. One factor reducing the number of formal opinion requests and opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal guidance in about 750 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter, in 97 situations during the year. Informal guidance covered nearly all aspects of the Ethics Law. Many advice inquiries were in part caused by State employee salary support limitations in State government which has resulted in a substantial number of post-employment and secondary employment questions. The combined total number of advice situations (formal, Commission informal, and staff informal) increased significantly during 1993.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law. The Commission was involved in reviewing a large number of requests by various agencies to add or delete people from the financial disclosure filing list. Action on these requests has increased the list of filers. The Commission also considered and acted upon requests by several advisory boards to be exempted from the requirement to file financial disclosure statements. Compliance review of forms is conducted as part of a phased program for review of the forms of officials and employees. Currently there are over 7,500 persons filing financial disclosure forms and this number continues to grow. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to some filers regarding the need to provide further information in order to meet filing requirements. The elimination of the position in late 1992 assigned to carry out most of the review led to a substantially reduced review program during that year and this impacted on 1993 to an even greater extent.

In addition to the regular financial disclosure program, a substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required, must file a form disclosing areas of existing conflicts with the Commission and the appointing authority. The Commission staff coordinated the filing of these forms with the appointing authority and assisted with a large number of appointees throughout the year to complete these disclosures.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1993, 1,208 lobbying registrations were filed with the Commission. This represents an increase from the 1,128 registrations filed in 1992 and the 1008 filed in 1991. The 1,208 registrations were filed by 510 different lobbyists on behalf of 717 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 698 employers having one or more registrants in the previous year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 80 lobbyists had two or more registrations during this time period, 47 registrants had four or more employers, and 29 lobbyists had eight or more employers. The Ethics Commission monitors lobbyist registration and reporting and other parts of the lobbying law limiting contingent fees and campaign finance activity. The Commission decided to add some limited on site auditing to the program for 1994. This auditing activity will be very limited due to funding limitations.

The \$14,014,976 in lobbying expenditures reported for the period of October 31, 1993, represents an increase of \$170,414 over the previous year. Lobbying expenditures have significantly increased since the Commission compiled \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. Expenditures for gifts and entertainment increased from \$803,330 to \$824,685. An analysis of individual reports indicates that 76 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 165 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate

that 42 of these persons reported \$50,000 or more in compensation for services. Twenty-four lobbyists reported compensation of \$100,000 or more. Examples of topic areas involving large total employer expenditures during the reporting period included banking, health, labor, business, attorneys, utilities, lottery, horse racing, and insurance. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in Appendices A and B of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/91</u>	<u>10/31/92</u>	<u>10/31/93</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 416,924	\$ 413,610	\$ 404,921
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 310,793	\$ 242,169	\$ 262,846
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 14,988	\$ 20,374	\$ 11,136
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 146,313	\$ 127,177	\$ 145,783
<u>Subtotal of items 1, 2, 3, & 4</u>	<u>\$ 889,018</u>	<u>\$ 803,330</u>	<u>\$ 824,686</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$ 9,719,863	\$ 10,436,523	\$ 11,069,943

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. \$86,250 of the \$145,783 reported for gifts in the period ending 10/31/93 reflects the value of these passes.

6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 713,264	\$ 701,103	\$ 565,697
7. Office expenses not reported in items 5 and 6.	\$ 711,353	\$ 702,045	\$ 783,917
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 273,779	\$ 401,749	\$ 171,154
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 304,533	\$ 391,287	\$ 182,622
10. Fees and expenses paid to witnesses.	\$ 4,850	\$ 33,351	\$ 73,482
11. Other expenses.	\$ 238,219	\$ 375,174	\$ 343,475
<u>Total of items 1 through 11</u>	<u>\$12,854,879</u>	<u>\$13,844,562</u>	<u>\$14,014,976</u>

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion. Because of the limited investigative resources available to the Commission and a shortage of operational expenses, there is a backlog of enforcement issues pending before the Commission.

In Calendar Year 1993 the Commission issued or accepted 81 complaints. Sixty-nine complaints involved financial disclosure matters, 9 complaints involved lobbyist matters, and 3 complaints related to conflict of interest issues. Also, during this year action was completed on 54 complaints. Forty-eight of these completed complaint cases were financial disclosure matters and 5 were lobbyist matters. Forty-three failure to file timely financial disclosure complaints were terminated by accepting late filing as a cure. Two late financial disclosure filing cases were completed by submission of the form, an admission of late filing violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State. One late financial disclosure complaint against an individual who had prior failure to file complaints was resolved by the individual paying the late fees, accepting a reprimand and a ten-day leave of absence without pay. One other financial disclosure matter was resolved by a stipulation which included an admission of violation and a reprimand. One matter was disposed of after a hearing, a finding of violation, and assessment of late fees. Two complaints against lobbyists for failure to timely file were resolved by submission of the form, waiver of confidentiality, reprimand, and payment of funds to the State. One thousand four hundred and fifty dollars was collected as a result of this process. The Ethics Law provides for the possibility of late fees or court imposed fines in late filing situations in some circumstances. Fifty-five complaints for failure to timely file financial disclosure or lobbying reports were still active at the end of the calendar year.

The Commission considered several other situations involving lobbyists who had failed to timely file either a registration or lobbying activity report. These matters resulted in lobbyists paying the fees in the amount of up to \$250 per report as allowed by the Ethics Law. The Commission received a total of \$1,750 in payments to the State of Maryland representing late fees from lobbyists.

A total of 2 conflict of interest complaints were resolved during Calendar Year 1993. One complaint was dismissed after a preliminary investigation where the Commission found that the evidence did not merit further proceedings. One matter was resolved by an agreement where the respondent had disposed of an interest, left State service and paid \$1,000 to the State. At the end of Calendar Year 1993, 5 complaints were pending involving conflict of interest.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State Law. In addition to the requirement that counties and cities enact ethics laws, in 1983, the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Most of the staff activity relating to local ethics programs during 1993 involved providing limited technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. As part of its responsibilities, the Commission completed review and approval of new or revised ethics laws for 10 localities during 1993. Some amended local laws were still under review at the end of the year. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. Part of the Commission's review activity during 1993 involved completing adjustments at the local level for cities whose exemption status had changed after the review of the 1990 Census.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. The Commission had also initiated an Ethics Bulletin which covered prohibitions, rules, procedures and Commission decisions along with a special bulletin sent to lobbyists when changes are made in that program. These two bulletins have been suspended due to fiscal limitations. Fiscal limitations in 1993 have essentially eliminated the ability to develop printed materials and distribute mailed items relating to this

part of the Commission program. A charge for those receiving the lobbyist list has been initiated due to insufficient printing funds. The Commission's staff does distribute, through interagency mail, a special two-page summary of ethics requirements to State agency managers. Special memos regarding the impact of the ethics law on gifts and on political activity are also distributed.

The Commission also decided to strengthen its employee ethics training programs which had been curtailed due to fiscal limitations. Programs in conjunction with the Department of Personnel began in December and several employee seminars to be held at various agencies are scheduled for early 1994.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

In 1993, the General Assembly only passed one bill that related to the State Ethics Law. This bill reestablished the Prince George's County land use ethics law program.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute and has been monitoring rewriting of the Ethics Law by the Code Revision Commission. The four recommendations listed below were specifically suggested by the Commission as issues that would be appropriately addressed by legislation in 1994.

1. Lobbyist Gift Disclosure

Under the current requirements of the State Ethics Law, lobbyists are required to disclose compensation, expenses, and gifts. Gift disclosure detail varies according to the nature of the gift and its value. Although there can be differing views about the adequacy of the current disclosure, the Commission believes that there is a significant loophole in the Law relating to the cumulative value of smaller gifts or the use of proration among clients to avoid disclosure of gifts. This occurs as a result of section 5-105(a)(3) of the Law, which allows gifts totalling less than \$15 per day not to count toward a \$75 disclosure requirement as to recipient. More importantly, where a lobbyist has more than one client, the costs of gifts can usually be divided by a number of clients thus never reaching the threshold for disclosure as to person. It is proposed that where a lobbyist makes or is involved in making gifts totalling \$750 to one person from one or more donors during a six month reporting period that this be disclosed. If the \$750 level were reached, each gift of \$75 or more would also be required to be disclosed. The proposal would provide some protection against abuse and create a more equitable set of disclosure rules. Under the current Law, lobbyists having more than one employer can avoid disclosure of gifts while those with only one employer must disclose larger or frequent gifts because proration of expenses is not available.

2. Lobbyist - Registration Fees

The State Ethics Law lobbying program consists of administering a registration requirement and a reporting requirement. It also includes administering a prohibition against contingent fees and limitations on campaign finance activity by lobbyists. The filing part of the program has grown significantly since the Commission assumed the program in 1979. In 1980, there were 445 lobbying registrations. In the registration period ending October 31, 1993, there were 1,208 registrations.

There are a variety of direct expenses associated with this program and additional costs related to the Commission per diem, staff compensation, and office rent. Direct costs include printing forms and informational materials, postage for distributing forms, program

information and enforcement actions. Staff in-State travel is also a direct cost along with telephone costs associated with calls to registrants or employers.

In spite of the fact that this is a growing program with increasing costs attributable to program growth or higher rates charged for expense items, the amount of funds available to administer the program has actually declined. In view of this situation, the Commission has concluded that some type of lobbying registration fee to be used for support costs has become unavoidable. Several other states have already enacted lobbying registration fees.

The proposed program is to charge \$20 for each lobbyist registration in a lobbying year after the first registration. Based on current data, the estimated maximum payment by one lobbyist would be \$1000. Most lobbyists required to pay the fee would pay \$100 or less. This proposal would, therefore, allow people representing themselves or people representing where they work or those affiliated with a single non-profit group or trade association to register without fee. In essence, these entities or people would not be charged a registration fee for representing their own interest.

3. Financial Disclosure - Attribution of Blind Trust

The State Ethics Law contains two major prohibitions which impact on the ownership interests of officials and employees. The first prohibition is contained in Article 40A, Section 3-101. This section prohibits an official or employee from participating in any matter in which he has an interest. The section also prohibits participation in other situations not the subject of this proposal. The main form of ownership interest impacted by Section 3-101 is holding stock in corporations. The second interest prohibition contained in Article 40A is Section 3-103(a). This section absolutely prohibits the holding of a financial interest in certain situations where the entity does business with or is regulated by the employees or officials agency or an affiliated agency. Both of these sections have exception authority that can be exercised by the State Ethics Commission. This authority has been exercised under 3-103(a) by regulations to some extent and under 3-101 by opinion in one instance as to a non-interest restriction. Generally, issues arise under the two sections in a variety of circumstances. Some officials have only a few very small holdings, others have a large holding in one or two companies that relate to their State position. Others have fairly limited holdings in a broad range of companies. This proposal is aimed at this third type of situation where an official has broad but limited in size holdings that could be at issue depending on the facts at the particular time and where sale of these holdings would not be reasonable under the circumstances. The proposal is not aimed at using a blind trust for narrow holdings held in regulated entities by regulators or those involved in procurement.

The Commission proposes the blind trust to apply to the broad stock holding situation. Under this program the Commission would implement its blind trust regulations which eliminates the application of 3-101 and 3-103(a) to blind trusts established and approved under Commission regulations. These regulations are similar to the federal requirements for these types of trusts. In order to implement the regulations, legislation is needed to provide that the holdings in approved blind trusts would not have to be included in the annual financial disclosure statements.

4. Post Employment

The current public Ethics Law regarding post-employment activities contains very technical language requiring close analysis to determine its application. Although the Law's intent is to protect the public interest, standing alone it has weaknesses in providing clear guidance and in enforcement cases. This is particularly true in evaluating the conduct of

higher level employees with primarily management responsibilities. Limited amendments to the current law are proposed which would not apply to legislators or part-time board and commission members. Essentially, the proposal adds to the current law but does not generally prevent private employment or contacts with the official's former agency but it does prohibit participation for compensation in post-employment matters for one year if the matter was in existence and part of the official's responsibility during the person's last 12 months of State service. The legislation would have exception authority and be limited to matters involving grants, procurement, regulatory authority, and tax liability. The amendments would not cover subsequent governmental employment.

5. Non-Participation

The existing Ethics Law prohibits an official or employee from participating in matters where the person's spouse, parent, minor child, brother or sister has an interest or is a party. This proposed bill would add adult children to the direct participation prohibition. Participating in procurement, regulatory personnel hiring, or other matters involving an adult child is just as much of a conflict as similar situations involving a sibling or parent.

Other Legislative Recommendations

Most of the recommendations listed below were made in previous Ethics Commission annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.

- There is a need to consider clearly adding former officials and employees to the persons prohibited from using confidential information under §3-107 of the Law.

- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to reduce delay and expensive court proceedings.

- Section 7-101 of the Law should be revised to make it clear that any fine levied by a court will be paid to the State of Maryland.

- The current Law does not seem to clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §3-102 of the Ethics Law, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. The existing Law should be amended to include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- The Commission has been presented with several situations where high State officials have been invited to serve on the board of directors of private corporations having sensitive business or regulatory involvement with the State. The existing Ethics Law provisions are not well designed to effectively deal with the conflicts that can be caused by such affiliations. It is recommended that membership by high officials on the boards of these types of corporations be dealt with more specifically in the Ethics Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly address gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances the ownership interest of a spouse is to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions relate clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel, such as court reporters, are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The law should be amended to expressly state that Deputy Sheriffs and other Sheriffs' Office employees other than the elected Sheriff are also covered by local ethics laws consistent with the Commission's advisory opinion on this topic.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The detailed disclosure of share dividends less than \$500 should be eliminated.

- The provisions of §4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.

- The bi-county agency ethics regulations requirements as to employees of these agencies should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- The Commission has informally determined that the bi-county agencies are to be treated as State or local agencies for the purposes of exemptions under the State lobbying registration requirements. The Law should be amended to specifically clarify their status under these provisions.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- The lobbyist restrictions regarding campaign finance activity should be made more specific as to the impact of these provisions on political party central committee membership by lobbyists.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

APPENDIX A

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 1992 - October 31, 1993

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1 . \$229,791.10	Maryland Bankers Association
2 . 204,536.76	Maryland Business Council
3 . 186,681.90	GTECH Corporation
4 . 162,354.12	Blue Cross & Blue Shield of Maryland
5 . 153,711.76	Health Facilities Association of Maryland
6 . 147,755.80	Medical Mutual Liability Insurance Society of Maryland
7 . 147,386.22	Johns Hopkins Health System
8 . 142,736.89	Chemical Industry Council of Maryland
9 . 135,611.05	Cable TV Association of MD, DE, & DC
10 . **130,004.44	Maryland Jockey Club
11 . 123,304.66	Lockheed Air Terminal, Inc.
12 . 121,957.04	C & P Telephone Company of Maryland
13 . 121,675.00	IBM Corporation
14 . 119,172.92	Common Cause/Maryland
15 . 118,290.79	Maryland Association of Health Maintenance Organization
16 . 116,309.62	Maryland Classified Employees Association
17 . 114,433.96	Maryland State Teachers Association
18 . 114,158.67	Maryland State Bar Association
19 . 113,036.80	Maryland Catholic Conference
20 . 108,632.27	Group Hospitalization & Medical Services
21 . 103,149.44	Philip Morris, U.S.A.
22 . 98,327.39	State Farm Insurance
23 . 96,156.86	Potomac Electric Power Company

** Includes Race Track Passes with a face value of \$86,250.00

24 .	94,223.11	Maryland Retail Merchants Association
25 .	93,173.95	Maryland Trial Lawyers Association
26 .	92,598.91	InforMed
27 .	90,674.00	A T & T
28 .	89,477.64	Medical & Chirurgical Faculty of Maryland
29 .	86,000.00	Dupont Company
30 .	82,711.67	Nationwide Insurance Company
31 .	81,857.73	ATANCA (Automotive Trade Association of the National Capital Area)
32 .	81,602.16	Healthplus
33 .	78,179.92	Maryland Association of Chain Drug Stores
34 .	77,000.00	Systems Control, Inc.
35 .	75,622.50	Maryland Medical Laboratory, Inc.
36 .	75,362.86	Health Insurance Association of America
37 .	74,537.46	United Thermal Development
38 .	73,829.51	American Petroleum Institute
39 .	72,967.25	Household International
40 .	71,845.29	University of Maryland Medical System
41 .	70,749.38	Potomac Edison Company, Inc.
42 .	66,817.75	Crown Central Petroleum
43 .	65,121.31	First National Bank of Maryland
44 .	64,480.17	Maryland New Car and Truck Dealers Assn.
45 .	64,389.33	Baltimore Gas & Electric Company
46 .	63,389.00	Association of Maryland Pilots
47 .	62,406.66	Maryland State & D.C. AFL-CIO
48 .	60,066.02	P.I.E. Mutual Insurance Company
49 .	60,000.00	Maryland General Hospital
50 .	60,000.00	Giant Food, Inc.
51 .	59,858.31	Marine Spill Response Corporation
52 .	59,818.00	Maryland Hospital Association.
53 .	59,781.25	National Federation of Independent Businesses

54 .	59,348.49	Homewood Healthcare Group, Inc.
55 .	57,891.82	Bethlehem Steel Corporation
56 .	57,891.82	Bethesda Chevy Chase Chamber of Commerce
57 .	57,399.40	United Way of Central Maryland
58 .	57,177.50	Maryland Independent College and University Association
59 .	56,957.16	Tudor Farms, Inc.
60 .	56,529.20	Pharmaceutical Manufacturers Association
61 .	56,359.72	Variable Annuity Life Insurance Co. (VALIC)
62 .	56,026.82	FORTTRAN
63 .	55,950.14	Independent Cement Corporation
64 .	53,892.43	National Assn. of Independent Insurers
65 .	53,680.41	Maryland Farm Bureau, Inc.
66 .	53,595.12	American Insurance Association
67 .	52,800.00	Prudential Health Care Plan
68 .	52,488.15	Maryland Society of Orthopedic, Rehab Specialists
69 .	51,775.32	Maryland State Dental Association
70 .	51,627.08	Maryland Highway Contractors Association
71 .	51,509.02	CSX Corporation
72 .	50,878.88	National Solid Wastes Management Assn.
73 .	50,749.00	Montgomery County Government
74 .	50,634.89	Maryland Association of Realtors
75 .	50,583.74	Maryland Psychological Association
76 .	50,000.00	Tobacco Institute
77 .	49,289.63	FMC Baltimore - Agricultural Chemicals
78 .	48,734.41	Maryland Builders Association
79 .	48,296.73	Montgomery County Association of Realtors
80 .	48,050.00	Maryland Food Committee
81 .	45,701.74	Manor Care, Inc.
82 .	45,501.78	CSX Transportation
83 .	45,411.72	Baltimore Jewish Council

84 .	45,401.30	Glaxo, Inc.
85 .	45,000.00	Honeywell
86 .	43,095.60	Coalition for Competition
87 .	41,911.47	Rubblefills Association of Maryland, Inc.
88 .	41,728.95	Commercial Wholesale Distributors' Coalition
89 .	41,211.59	Systemhouse
90 .	40,901.68	Johns Hopkins University
91 .	40,893.00	Environmental Systems Products, Inc.
92 .	40,542.00	Maryland Insurance Council
93 .	40,187.80	Washington Gas, Maryland Division
94 .	39,769.02	Maryland DC Society of Anesthesiologists
95 .	39,468.68	Maryland Rental Car Coalition
96 .	39,246.50	Golden Rule Insurance Company
97 .	39,085.76	Radiation Care, Inc.
98 .	38,817.28	Maryland Association of Mutual Insurance Companies
99 .	38,271.20	Merck, Sharp & Dohme
100 .	38,160.90	Coca-Cola Enterprises-Northeast
101 .	38,085.34	Waste Management of North America, Inc.
102 .	37,500.00	Jostens Learning Corporation
103 .	37,320.42	Ryland Group
104 .	36,777.10	Greenhorne & O'Mara, Inc.
105 .	36,284.88	Maryland Chiropractic Association
106 .	35,948.80	Deaton Specialty Hospital & Home
107 .	35,387.56	Mayor and City Council of Baltimore
108 .	35,312.26	UNISYS Corporation
109 .	35,151.55	Maryland Managed Care Association, Inc.
110 .	35,044.83	Maryland Association of Certified Public Accountants
111 .	35,037.77	Apartment & Office Bldg.Assn.of Metro Wash.
112 .	34,906.50	Maryland Pharmacists Association
113 .	33,855.84	Marriott Corporation

114 .	33,752.33	American Lung Association of Maryland
115 .	33,749.55	Rouse Company, Inc.
116 .	33,586.48	Sun Oil Co. Inc.
117 .	32,925.25	Maryland Soft Drink Association
118 .	32,605.05	Maryland Aggregates Association
119 .	32,062.96	Wheat, First Securities, Inc.
120 .	31,961.32	American Physical Therapy Association
121 .	31,843.28	Recovermat of Maryland, Inc.
122 .	31,682.00	National Medical Enterprises, Inc.
123 .	31,463.00	Winchester Homes, Inc.
124 .	31,196.67	Texaco, Inc.
125 .	30,307.25	Southland Corporation
126 .	30,215.84	Sun Life Insurance Company of America
127 .	47,409.62	League of Life & Health Insurers of Md.
128 .	29,906.60	Coalition for Insurance Competition
129 .	29,820.00	Family Protection Lobby
130 .	29,806.30	Maryland Motor Truck Association, Inc.
131 .	29,535.78	Correctional Medical Systems
132 .	29,500.00	American Council of Life Insurance
133 .	29,370.91	Washington Suburban Sanitary Commission
134 .	29,307.12	Maryland Cab Association
135 .	29,258.96	Citicorp
136 .	29,130.00	Planned Parenthood of Maryland
137 .	29,105.20	Maryland Securities Industries
138 .	29,074.51	Maryland Land Title Association
139 .	29,049.81	Maryland State Assn. of Life Underwriters
140 .	28,717.95	Rockville Center, Inc.
141 .	28,329.73	Maryland Association of Boards of Education
142 .	28,090.06	Maryland Radiological Society
143 .	28,085.52	Restaurant Association of Maryland, Inc.

144 .	27,665.78	Youth Services International
145 .	27,654.78	Anheuser-Busch Companies, Inc.
146 .	27,573.12	Mental Health Association of Maryland
147 .	27,203.34	Chesapeake Bay Foundation
148 .	26,908.40	Marylander's for Efficient and Safe Highways
149 .	26,788.66	MCI Telecommunications
150 .	26,782.78	American Automobile Manufacturers Assn.
151 .	26,633.00	Mothers Against Drunk Driving
152 .	26,628.07	Maryland REA, Inc.
153 .	26,548.28	Federation of Maryland Teachers
154 .	26,464.86	Professional Insurance Agents Association
155 .	26,215.65	Maryland State Licensed Beverage Assn.
156 .	26,188.88	Upjohn Company
157 .	26,071.70	Liberty Medical Center
158 .	26,036.68	General Mills Restaurants, Inc.
159 .	25,958.61	Maryland Academy of Physicians Assistants
160 .	25,820.64	Golden Hour Coalition
161 .	25,818.90	Kaiser Foundation Health Plan of Mid-Atlantic States
162 .	25,703.04	National Assn. of Office & Industrial Parks
163 .	25,611.15	Travilah Recovery Industries, Inc.
164 .	25,351.50	National Assn. of Social Workers, MD Chapter
165 .	25,000.00	Crescent Cities Jaycees Foundation, Inc.

APPENDIX B

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION

ALL CLIENTS

November 1, 1992 - October 31, 1993

1 .	\$807,375.80	Bereano, Bruce C.
2 .	584,270.00	Rifkin, Alan M.
3 .	475,891.25	Evans, Gerard E.
4 .	400,214.50	Cooke, Ira C.
5 .	367,963.00	Goldstein, Franklin
6 .	331,566.12	Doyle, James J., Jr.
7 .	316,245.26	McCoy, Dennis C.
8 .	306,588.58	Schwartz, Joseph A., III
9 .	275,500.00	Rasmussen, Dennis
10 .	204,980.46	Burridge, Carolyn T.
11 .	194,133.19	Davis, Michael H.
12 .	190,822.50	Tiburzi, Paul A.
13 .	179,898.37	Pitcher, J. William
14 .	178,856.19	Doolan, Devin John
15 .	170,225.00	Manis, George N.
16 .	166,319.18	Enten, D. Robert
17 .	164,095.50	Adler, Maxine
18 .	157,489.73	Neil, John
19 .	154,323.70	Shaivitz, Robin F.
20 .	126,279.00.	Barbera, Thomas P.

21 .	116,167.00	Mandel, Marvin
22 .	115,122.96	Doherty, Daniel T., Jr.
23 .	114,630.00	Goeden, James P.
24 .	102,750.00	Levin, Barbara
25 .	95,000.00	O'Dell, Wayne
26 .	93,215.25	Neily, Alice, J.
27 .	78,044.00	Johansen, Michael V.
28 .	76,435.00	Canning, Michael F.
29 .	75,171.41	Winchester, Albert, III
30 .	75,000.00	Sweeney, Robert P.
31 .	73,875.88	Shelton, Paul D.
32 .	66,000.00	Skaggs, L. Craig
33 .	64,205.04	Steward, William R.
34 .	62,500.00	Wyatt, Maurice
35 .	60,000.00	Scher, Barry F.
36 .	58,157.76	Silver, Edgar P.
37 .	54,065.00	Wyatt, Joseph R.
38 .	53,488.60	Popham, Bryson
39 .	52,385.00	Dunbar, William M.
40 .	50,864.99	Bowers, John B., Jr.
41 .	50,622.00	Kasemeyer, Edward J.
42 .	50,000.00	Thienel, Stephen C.

